# **Form 603**

## Corporations Act 2001 Section 671B

# Notice of initial substantial holder

To Company Name/Scheme	Sandfire Resources Limited
ACN/ARSN	105 154 185

## 1. Details of substantial holder (1)

Name	Australian Retirement Trust Pty LTD ATF Australian Retirement Trust
ACN/ARSN (if applicable)	010 720 840

The holder became a substantial holder on  $\frac{17}{06}/\frac{2024}{2024}$ 

## 2. Details of voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)	
Fully paid ordinary shares 22,906,978		22,906,978	5.009%	

### 3. Details of relevant interests

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities	
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	Power to exercise voting rights pursuant to position held as trustee of a superannuation fund.	Fully paid ordinary shares 22,906,978	

## 4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust  HSBC Custody Nominees (Australia)Limited			Fully paid ordinary shares 22,906,978

## 5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9	)	Class and number of securities
		Cash Non-cash		
Refer to Annexure A				

#### 6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN/ARSN (if applicable)	Nature of association

#### 7. Addresses

The addresses of persons named in this form are as follows:

Name	Address
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	266 George Street, Brisbane City QLD 4000

# **Signature**

print name Yaozhi Pan Aisling Fitzpatrick capacity Authorised Signatory

sign here Couli Pan date 19/06/2024

### **DIRECTIONS**

- (1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of:
  - (a) any relevant agreement or other circumstances by which the relevant interest was acquired. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
  - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.

- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in

relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

# Annexure A

Holder of Relevant Interest	Purchase/Sale	Trade Date	Consideration	Consideration	Number of
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/02/2024	(Cash) 4,415.60	(Non-Cash)	Securities 599
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	22/02/2024	9,507.55		1,300
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	23/02/2024	88,970.30		12,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/02/2024	7,309.75		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	27/02/2024	209,353.10		28,178
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	28/02/2024 28/02/2024	4,344.45 359,435.78		594 47,825
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	29/02/2024	24,311.66		3,249
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/02/2024	5,035.55		665
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	29/02/2024	372,563.20		49,643
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	1/03/2024	7,523.55		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY SELL	5/03/2024 5/03/2024	9,508.35 46,076.71		1,245 6,123
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	5/03/2024	1,562,409.09		205,851
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	6/03/2024	24,011.26		3,147
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	7/03/2024	19,996.64		2,528
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/03/2024	442,681.51		55,907
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/03/2024	63,315.45		8,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	12/03/2024 14/03/2024	81,909.59 1,063,765.52		10,200 135,214
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	15/03/2024	19,128.30		2,447
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/03/2024	698,237.28		88,889
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	18/03/2024	8,517.32		1,026
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/03/2024	24,170.37		2,864
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	19/03/2024	115,874.29		13,811
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	19/03/2024	2,620,316.26		312,764
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	20/03/2024 22/03/2024	19,931.80 6,859.89		2,335
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/03/2024	291,674.96		34,238
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/03/2024	894.37		106
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	25/03/2024	9,154.04		1,050
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/03/2024	236,338.82		27,180
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/03/2024	30,526.30		3,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY SELL	26/03/2024 28/03/2024	2,015,260.54 5,700.88		232,580
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/03/2024	281,172.88		33,075
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	2/04/2024	13,642.29		1,612
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	3/04/2024	13,269.11		1,501
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/04/2024	18,655.58		2,124
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	4/04/2024	8,494.25		952
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY BUY	4/04/2024 4/04/2024	119,805.10 238,687.43		13,434 26,769
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	5/04/2024	1,799.45		200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	5/04/2024	143,379.17		16,045
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	8/04/2024	3,387.30		375
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	8/04/2024	97,034.52		10,699
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/04/2024	10,017.45		1,111
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY BUY	9/04/2024 9/04/2024	837,445.13 91,494.66		94,814
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	11/04/2024	1,940,730.85		213,793
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/04/2024	29,867.28		3,300
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/04/2024	54,919.54		6,069
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/04/2024	9,998.61		1,134
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	15/04/2024	8,775.75		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY SELL	15/04/2024 16/04/2024	50,799.58 873.57		5,761
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/04/2024	30,159.29		3,300
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/04/2024	762,259.88		83,705
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	18/04/2024	291,954.41		32,200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/04/2024	2,200,112.18		240,871
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/04/2024	2,770.95		300
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	24/04/2024 24/04/2024	637,379.47 1,015,364.75		69,356 112,179
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/04/2024	113,349.94		112,179
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	272,353.63		30,138
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	977,355.60		107,490
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	169,677.95		18,750
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/04/2024	791,786.95		87,553
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/04/2024	170,473.13		18,750
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY BUY	30/04/2024 1/05/2024	5,108.95 5,661.45		550 600
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	1/05/2024	1,156,411.33		121,227
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	2/05/2024	1,594,179.88		166,351
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	2/05/2024	509,599.78		53,316
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	3/05/2024	3,687,202.45		402,761
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	283,793.25		30,845
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	6/05/2024	55,473.68		6,010

# Annexure A

Holder of Relevant Interest	Purchase/Sale	Trada Data	Consideration	Consideration	Number of
		Trade Date	(Cash)	(Non-Cash)	Securities
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/05/2024	913,431.44		97,435
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/05/2024	21,221.11		2,285
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	8/05/2024	440,763.91		45,833
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	8/05/2024 8/05/2024	3,013.95 727,973.30		75,719
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/05/2024	895,472.00		91,368
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/05/2024	4,564.22		470
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/05/2024	10,000.25		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	16/05/2024	4,883.55		500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	743,560.58		75,719
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	16/05/2024	743,560.58		75,719
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/05/2024	29,465.82		2,976
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/05/2024	1,538,852.89		156,723
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	20/05/2024	4,808.55		500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	20/05/2024	458,667.71		47,605
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	20/05/2024	28,315.15		2,928
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	21/05/2024	489,713.64		51,634
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	21/05/2024	193,750.74		20,196
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	21/05/2024 22/05/2024	228,966.08 72,577.08		23,857 7,236
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/05/2024	1,031,719.52		102,955
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	22/05/2024	633,220.45		63,314
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	22/05/2024	633,365.83		63,314
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/05/2024	111,226.07		11,136
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	23/05/2024	10,109.95		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/05/2024	779,948.05		77,974
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/05/2024	325,195.69		32,737
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	24/05/2024	325,397.80		32,385
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/05/2024	55,133.25		6,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/05/2024	189,866.15		20,686
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/05/2024	5,011.05		540
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/05/2024	37,605.33		4,132
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/05/2024	2,890.95		300
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/05/2024	261,446.13		27,507
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	31/05/2024 31/05/2024	3,324,402.23		343,327 2,066
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	31/05/2024	20,120.80 998,421.03		102,676
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	3/06/2024	3,192,882.75		343,327
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/06/2024	10,012.11		1,076
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	4/06/2024	9,862,237.78		1,067,567
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	4/06/2024	231,046.50		24,978
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	5/06/2024	48,539.41		5,091
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	6/06/2024	2,633,876.07		280,764
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	6/06/2024	1,512,114.50		160,893
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/06/2024	1,776,252.80		200,480
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	7/06/2024	17,692.67		1,976
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	7/06/2024	248,310.11		27,790
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/06/2024	754,762.59		83,431
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/06/2024	242,312.24		26,714
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	11/06/2024 13/06/2024	827,874.04 1,755,142.30		91,516 197,207
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust  Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/06/2024	4,950.55		550
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/06/2024	111,831.89		12,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/06/2024	43,522.98		4,837
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/06/2024	10,094.00		1,156
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/06/2024	254,143.69		29,111
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/06/2024	10,790.09		1,256
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/06/2024	4,114.41		486
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/06/2024	109,109.00		12,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/06/2024	157,346.35		18,390
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	1,737,767.70		200,898
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	946,229.46		111,765
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	138,800.45		15,852
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	86,452.80	<u> </u>	10,217